

PROPOSED PROJECT SUMMARY

INDUSTRIAL METAL COATING – STERLING HEIGHTS, MACOMB COUNTY, MICHIGAN

INDUSTRIAL METAL COATING

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for Industrial Metal Coating (IMC). The AQD will accept comments on the proposed PTI until the close of the comment period on April 28, 2023. We will review all comments before we make a final decision on the proposed PTI.

WHAT DOES IMC CURRENTLY DO?

IMC coats metal parts used in the automotive industry. Parts are placed on racks and coated using an electrodeposition (e-coat) process. After the parts are cured, the racks are placed in a burn-off oven to remove the cured coating and prepare them to be reused.

WHAT CHANGES ARE HAPPENING AT IMC?

IMC installed secondary chamber afterburners on two burn-off ovens and increased the height of stacks on the e-coat drying oven, as required by an enforcement action. These changes, and a nuisance minimization plan for odors, are being added to their permit. The remaining two burn-off ovens at the facility will not be allowed to operate until secondary chamber afterburners are installed on each of them.

WHAT IS A SECONDARY CHAMBER AFTERBURNER?

A secondary chamber afterburner is a device used to destroy particulate matter and volatile organic compounds in the exhaust from the burn-off ovens. The exhaust gas leaving the burn-off oven is heated to at least 1,400°F by natural gas burners in the chamber, which burns up most of the particulate matter and volatile organic compounds.

WHAT IS A PTI AND WHY IS ONE NEEDED?

A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying

most processes or process equipment that may emit air contaminants. One example of such a project is installing afterburners on the burn-off ovens and raising the height of the e-coat oven stacks.

The AQD has reviewed the application and written proposed permit conditions that include requirements to make sure the project complies with all applicable air rules and regulations.



Figure 1: Location of IMC 6070 18 Mile Rd, Sterling Heights

WHY IS IMC GOING OUT TO PUBLIC COMMENT?

IMC has received odor complaints from the e-coat process and associated burn-off ovens. IMC is considered a source of public interest, so the application requires public comment. The installation of afterburners on the burn-off ovens is

part of a consent judgement between IMC and the AQD to address the odors from the facility.

WHAT IS THE CURRENT AIR QUALITY IN THE AREA?

The United States Environmental Protection Agency (USEPA) has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for [some pollutants](#), including sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter equal to or less than 10 microns in diameter (PM₁₀), particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}), ozone and lead.

Poor air quality from high levels of pollution can cause health problems. The NAAQS are developed from research studies and set at levels to protect public health. This includes health protection for sensitive groups, like those with heart and lung problems.

The facility is located in Macomb County, Michigan which is currently meeting all of the NAAQS except for ozone. The AQD operates two air monitoring stations in Macomb County. The Warren Fire Station monitor and the New Haven monitor both measure ozone. Note, the purpose of the air monitoring stations is to assess the regional or area-wide air quality and are not used to determine if a specific source is in compliance with their air permit.

WHAT DO I REALLY NEED TO KNOW ABOUT THE PROPOSED PERMIT?

The proposed permit has specific requirements IMC would have to follow if the permit is approved. Key areas you may be interested in, or that you may want more details on, include:

- **Material limits** - this specifies the type of material allowed to be burned off in the ovens.
- **Operational restrictions** – how the burn-off ovens must be operated.

- **Monitoring and Recordkeeping** – requirements for what must be monitored and what records must be kept to show compliance.

WAS ANY TRANSLATION INTO OTHER LANGUAGES DONE?

An evaluation of the number of people who speak English “less than very well” within a 1-mile radius of the proposed project’s location was done. This is required by EGLE’s [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation into Arabic would be helpful. The AQD translated:

- [the Notice of Hearing](#),
- [the Proposed Project Summary](#),
- [and Interested Party Letter](#)

If translation into other languages is needed or if there are other accessibility concerns with this public comment period, please send requests to EGLE-Accessibility@Michigan.gov.

WHERE CAN I FIND MORE INFORMATION?

Other information, such as the translated documents, the [Technical Fact Sheet](#) and the [proposed permit conditions](#) can be found at Michigan.gov/EGLEAirPublicNotice, choose “Applications Open for Comment.”

The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, such as:

- A summary of the reviews completed by AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require IMC to do.
- A summary of the emission limits that are included in the proposed permit.
- The rules and regulations that apply to the proposed project.
- Example emission calculations.

AQD staff can provide additional information upon request.

SUMMARY:

The AQD has reviewed the PTI application submitted by IMC and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we recommend approving the proposed permit.

However, before the AQD acts on the PTI application, we are requesting comments from the public. All comments received during the public comment period and public hearing, if held, will be reviewed before a decision is made. The decision maker may approve, approve with modifications, or deny the proposed PTI application.

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Jacob Young, AQD, at: YoungJ30@Michigan.gov or 517-582-5218.

WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. But it is also important to know the law is clear about what we can and cannot consider when we make our decision. Some examples are below.

What we can consider	What we can't consider
<ul style="list-style-type: none"> ✓ Technical mistakes in the review ✓ Grammar and spelling mistakes ✓ Other rules the action should consider and why ✓ Why the action will not follow the rules 	<ul style="list-style-type: none"> • Air, land, or water issues not part of the project • Indoor air pollution • Traffic • Noise and lights • Zoning issues • Anything unrelated to the project

HOW CAN I MAKE A COMMENT?

The AQD welcomes comments from the public during the comment period. Prior to making a comment, it is a good idea to “[View an Example](#)” of how to do it. You may also want to read the “[Public Hearings - What you should know](#)” card.

Documents pertaining to IMC can be found at: Michigan.gov/EGLEAirPublicNotice

Comments must be received by April 28, 2023.



Via email

EGLE-AQD-PTIPublicComments@Michigan.gov



Via US mail

Cindy Smith, Permit Section Manager, EGLE, AQD, P.O. Box 30260
Lansing, MI 48909-7760



Via voicemail

by calling 517-284-0900



At the Virtual Public Hearing, if requested in writing by April 6, 2023 to the address above, it will be held on April 13, 2023.

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